

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MASSACHUSETTS
EASTERN DIVISION**

In Re:

JOHN MALONE

Debtor

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**Chapter 13
Case No. 24-10885-CJP**

DEBTORS' MOTION TO SELL PROPERTY

Now comes, John Malone, ("Debtor") by and through undersigned counsel, Glenn F. Russell, Jr., and who herein respectfully files his Motion to Sell the Property located at 26 Savin Hill Avenue, Dorchester MA. In support thereof, the Debtor states as follows:

1. There will be no Real Estate Broker involved in the transaction.
2. All creditors will be paid in full of the proceeds from the sales transaction, where there will be a 100% dividend to all allowable claimants
3. The Debtor will file an Amended Chapter 13 Plan to reflect a lump sum Plan as described above.

WHEREFORE, for all of the foregoing reasons, the Debtor, by and through his counsel, Glenn F. Russell, Jr., respectfully requests that the Court Grant the Debtor's Motion to sell the Property located at 26 Savin Hill Avenue, Dorchester Massachusetts, in order to utilize the proceeds from said sale to fund a lump sum Chapter 13 Plan to pay all allowable claimants a 100% Dividend.

Respectfully submitted,

Date: December 16, 2024

01/03/2025 THE MOTION AT ECF NO. 97 HAS
BEEN SUPERSEDED BY ECF NO. 106.

